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March 20, 2024

Via ECF

Hon. Vernon S. Broderick
U.S. District Court Judge
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 03/20/2024

Re: United States v. Andrew Franzone
21 cr. 446 (VSB)

Dear Judge Broderick:

On March 8, 2024, Your Honor appointed me pursuant to CJA to represent Andrew Franzone on the above-captioned matter.

I am respectfully writing to request that the Court permit the appointment of Daniel Wachtell, Esq. as associate CJA counsel for Mr. Franzone's case at an hourly rate of \$125, with approval of 200 hours. Mr. Wachtell has been a criminal defense attorney for approximately 15 years, has handled numerous criminal cases and trials in federal and state courts and is a member of the CJA *habeas corpus* panel for the Southern District of New York.

Mr. Wachtell is available to assist with the trial on this matter in November 2024. Mr. Wachtell's appointment would have the benefit of both timely reviewing the voluminous discovery ahead of the trial as well as the conservation of CJA funds and resources by virtue of Mr. Wachtell's reduced billing rate. Thank you for your consideration in this matter and I am happy to provide more information upon the Court's request.

Respectfully Submitted,

s/ Elena Fast
Elena Fast, Esq.
Counsel for Andrew Franzone

cc: All counsel (via ECF)